

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO - WESTERN DIVISION**

GERALD CASH, <i>et al.</i>	:	Case No. C-1-01-753
	:	
Plaintiffs,	:	(Honorable Sandra S. Beckwith)
	:	
v.	:	JOINT MOTION TO EXTEND
	:	DISCOVERY AND DISPOSITIVE
HAMILTON COUNTY DEPT. OF ADULT	:	MOTION DEADLINE
PROBATION, <i>et al.</i>	:	
	:	
Defendants	:	

The parties jointly move to extend the deadlines for completing discovery until August 7, 2006 and August 14, 2006, respectively. This extension is being requested due to previously unforeseen difficulties in obtaining the depositions of remaining witnesses for both plaintiffs and defendants.

Respectfully submitted,

/s/ Stephen J. Felson  
Stephen J. Felson, 0038432  
Robert B. Newman, 0023484  
Suite 1401  
617 Vine Street  
Cincinnati, Ohio 45202  
*Counsel For Plaintiffs*

/s/ Richard Ganulin  
Richard Ganulin, 0025642  
Assistant Solicitor  
City Hall, Room 226  
801 Plum Street  
Cincinnati, Ohio 45202  
*Counsel For the City of  
Cincinnati*

/s/ David T. Stevenson  
David T. Stevenson, 0030014  
Assistant Prosecutor  
Suite 4000  
230 East Ninth Street  
Cincinnati, Ohio 45202  
*Counsel For County  
Defendants*